

1 LAURA VARTAIN HORN (SBN: 258485)
Laura.vartain@kirkland.com
2 **KIRKLAND & ELLIS LLP**
555 California Street, 30th Floor
3 San Francisco, CA 94104
Telephone: (415) 439-1400

4
5 ALLISON M. BROWN (Pro Hac Vice
admitted)
alli.brown@kirkland.com
6 2005 Market Street, Suite 1000
Philadelphia, PA 19103
7 Telephone: (215) 268-5000

8 JESSICA DAVIDSON (Pro Hac Vice
admitted)
9 jessica.davidson@kirkland.com
601 Lexington Avenue New York, NY 10022
10 Telephone: (212) 446-4800

11 *Attorneys for Defendants*
12 UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC
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14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

16 IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
17 LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

18 This Document Relates to:

19 *Jaylynn Dean v. Uber Technologies, Inc., et al.*,
20 3:23-CV-06708

**STIPULATION AND [PROPOSED]
ORDER TO PERMIT PROVISIONALLY
FILING UNDER SEAL**

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

22 WHEREAS, on December 19, 2025, Uber and Plaintiffs will file a letter motion concerning
23 Uber’s motion to strike the supplemental reports of Plaintiffs’ experts Lacey Keller and John
24 Chandler (“Letter Motion”).

25 WHEREAS, the exhibits to the Letter Motion include extensive expert reports, whose
26 subject matter significantly overlaps with documents that are the subject of other sealing motions
27 that have been or will be filed with Judge Breyer.

28 WHEREAS, the parties agree that exhibits to the Letter Motion (and any redactions to the
STIPULATION TO PERMIT PROVISIONAL FILING

Letter Motion itself) should be filed provisionally under seal to provide additional time for Uber to file a substantive motion to seal so that it may harmonize its sealing requests with its other sealing motions.

Whereas the parties agree that Uber's motion to seal the exhibits to the Letter Motion should be due on or before December 30, 2025, the date on which Uber's statement concerning the sealing of plaintiffs' summary judgment opposition papers is due to be filed with Judge Breyer. ECF 4691.

WHEREAS, the Court has extended other deadlines in the case, but not this one.

WHEREAS, the requested extension will have no bearing of the rest of the case schedule.

THEREFORE, the parties respectfully request the Court enter the parties' stipulation permitting the parties to file the exhibits to the Letter Motion provisionally under seal and extending Defendants' deadline to file its motion to seal those exhibits until December 30, 2025.

IT IS SO STIPULATED.

DATED: December 19, 2025

Respectfully submitted,

By: /s/ Laura Vartain Horn

KIRKLAND & ELLIS LLP
 Laura Vartain (SBN 258485)
 laura.vartain@kirkland.com
 555 California Street
 San Francisco, CA 94104
 Telephone: (415) 439-1400

Allison M. Brown (*Admitted Pro Hac Vice*)
 alli.brown@kirkland.com
 2005 Market Street, Suite 1000
 Philadelphia, PA 19103
 Telephone: (215) 268-5000

Jessica Davidson (*Admitted Pro Hac Vice*)
 jessica.davidson@kirkland.com
 601 Lexington Avenue New York, NY 10022
 Telephone: (212) 446-4800

Attorneys for Defendants
 UBER TECHNOLOGIES, INC.,
 RASIER, LLC, and RASIER-CA, LLC

1 Dated: December 19, 2025

/s/ Andrew R. Kaufman

2 ANDREW R. KAUFMAN (*Admitted Pro Hac Vice*)
3 SARAH R. LONDON (SBN 267083)
4 GIRARD SHARP LLP
5 601 California St., Suite 1400
6 San Francisco, CA 94108
7 Telephone: (415) 981-4800
8 Email: slondon@girardsharp.com
9 akaufman@girardsharp.com

10 RACHEL B. ABRAMS (Cal Bar No. 209316)
11 ADAM B. WOLF (Cal Bar No. 215914)
12 SARA B. CRAIG (Cal Bar No. 301290)
13 PEIFFER WOLF CARR KANE CONWAY
14 & WISE, LLP
15 555 Montgomery Street, Suite 820
16 San Francisco, CA 94111
17 Telephone: 415.766.3544
18 Facsimile: 415.840.9435
19 Email: rabrams@peifferwolf.com
20 awolf@peifferwolf.com
21 scraig@peifferwolf.com

22 ROOPAL P. LUHANA (*Admitted Pro Hac Vice*)
23 CHAFFIN LUHANA LLP
24 600 Third Avenue, Fl. 12
25 New York, NY 10016
26 Telephone: (888) 480-1123
27 Email: luhana@chaffinluhana.com

28 *Co-Lead Counsel for Plaintiffs*

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: December 19, 2025

/s/ Laura Vartain Horn

Laura Vartain Horn

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated: December __, 2025

Honorable Lisa J. Cisneros
United States Magistrate Judge